

To Court

IN THE UNITED STATES COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Robinane Altieri

Debtor

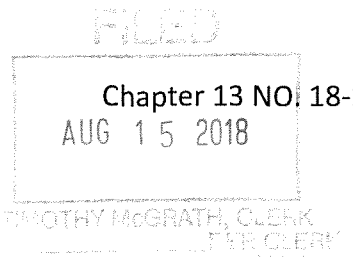
Vs

Wilmington Savings Fund Society, FSB d/b/a/

Christiana Trust, not individually but as trustee

For Pretium Mortgage Acquisition Trust, Movant

William C. Miller, Trustee



NOTICE OF ANSWER TO MOVANTS MOTION FOR RELIEF FROM THE AUTOMATIC STAY I PRAY  
THE COURT DOES NOT GRANT THE RELIEF FROM THE AUTOMATIC STAY

1. I, Robinanne Altieri, kindly ask the Court for a Continuance in Regard to the September 4<sup>th</sup>, 2018 Hearing of this matter, at 10:30 AM. Due to Medical Reasons. Exhibit A.
2. I, Robinanne Altieri, am not the Debtor in Regard to this Mortgage. I am the daughter of the deceased, Robert L. Altieri DOB, 7/17/1937. He was deceased since May 27<sup>th</sup>, 2016.
3. The Mortgage Payments Ms. Solarz is suggesting, were never divulged to me, debtor Robinanne Altieri, or served to me on paper or verbally, therefore I had no idea that they existed. In effect, how could I have paid them? Santander Bank claimed to be the Mortgage Holder, Exhibit B.
4. I, Robinanne Altieri am daughter of Robert Altieri. Birth Certificate Enclosed, Exhibit C.
5. I, Robinanne Altieri request that the Automatic Stay Continue in regard to this matter as I was unaware of this situation and can easily remedy it, by figuring any arrears incurred into the repayment plan for my Chapter 13 Bankruptcy Plan. Which I will file as soon as possible due to my Medical Condition. I was Assaulted on July 24<sup>th</sup>, and have great difficulty Ambulating, moving due to herniated discs in my back, at this time. Exhibit D.
6. I am also fighting a Protection from Abuse Order at this time and kindly require some time to straighten these things out. Thank You.

WHEREFORE, I, Robinanne Altieri, Kindly request that the STAY remain in effect permitting Me, the Debtor to Adequately Consolidate my debts as well as any debts of my dads, Robert Altieri, that I am responsible for. I kindly ask for a Continuance for the Hearing Scheduled for September 4<sup>th</sup>, at 10:30 as well due to the Medical and Clerical Reasons set forth above.

Sincerely, Robinanne Altieri Debtor

Cc/ Rebecca A Solarz, Esquire

A handwritten signature in black ink, which appears to be 'Robinanne Altieri'. Below the signature, the date 'Aug. 10<sup>th</sup>, 2018' is handwritten in black ink.

KML Law Group PC

BNY Mellon Independence Center

701 Market Street, Suite 5000

Philadelphia, PA 19106

Attorneys for Movant

## AFTER VISIT SUMMARY

Robin A Altieri MRN: 000010410530

7/24/2018

Bryn Mawr Hospital Emergency Department 484-337-3770

**Bryn Mawr Hospital**  
Main Line Health®

### Instructions

TAKE MOTRIN AND TYLENOL EVERY 6 HOURS FOR PAIN

ALTERNATE ICE AND HEAT ON THE AFFECTED AREA, 20 MINUTES ON  
20 MINUTES OFF

RETURN TO THE ER IF ANY INCREASE IN FEVER > 101, INCREASE BACK  
PAIN, NECK PAIN, NUMBNESS OR TINGLING IN YOUR TOES, CHANGE  
IN BOWEL OR BLADDER FUNCTION, CHANGE IN COLOR OR  
TEMPERATURE OF YOUR TOES, INCREASE, HEADACHE, DIZZINESS,  
BLOOD IN YOUR URINE, WEAKNESS IN YOUR LEGS OR ANY  
CONCERNS, VOMITING OR ANY CONCERNS



#### Read the attached information

1. Lumbosacral Strain (English)
2. Thoracic Strain (English)



#### Schedule an appointment with Xiaobin Li, MD as soon as possible for a visit in 2 days (around 7/27/2018)

Contact: 2010 WEST CHESTER PIKE  
SUITE 448  
Havertown PA 19083  
610-853-2502



#### Follow up with Bryn Mawr Hospital Emergency Department

Why: As needed, If symptoms worsen  
Specialty: Emergency Medicine  
Contact: 130 South Bryn Mawr Avenue  
Bryn Mawr Pennsylvania 19010  
484-337-3770

### What's Next

You currently have no upcoming appointments scheduled.

### Additional Information

If you do not continue to improve, or if your condition worsens, please call your doctor or the Emergency Department right away. You may also

### Today's Visit

You were seen by Richard Shoemaker, MD  
and Lori H. Bodenheimer, PA

#### Reason for Visit

Assault Victim

#### Diagnoses

- Strain of lumbar region, initial encounter
- Thoracic myofascial strain, initial encounter

#### Imaging Tests

CT ABDOMEN PELVIS WITHOUT IV  
CONTRAST

X-RAY LUMBAR SPINE 2 OR 3 VIEWS

X-RAY RIBS LEFT WITH PA CHEST

#### Your End of Visit Vitals

Blood Pressure	Temperature (Tympanic)
131/73	99.8 °F
Pulse	Respiration
111	18
Oxygen Saturation	
99%	

*Exhibit A*

*\* Very Much Trouble Walking*

COMMONWEALTH OF PENNSYLVANIA • DEPARTMENT OF HEALTH

**VITAL RECORDS**

WARNING: IT IS ILLEGAL TO DUPLICATE THIS COPY BY PHOTOSTAT OR PHOTOGRAPH

*Certification of Birth*

Date of Birth: **JUNE 30, 1965**

State File Number: **094380-1965**

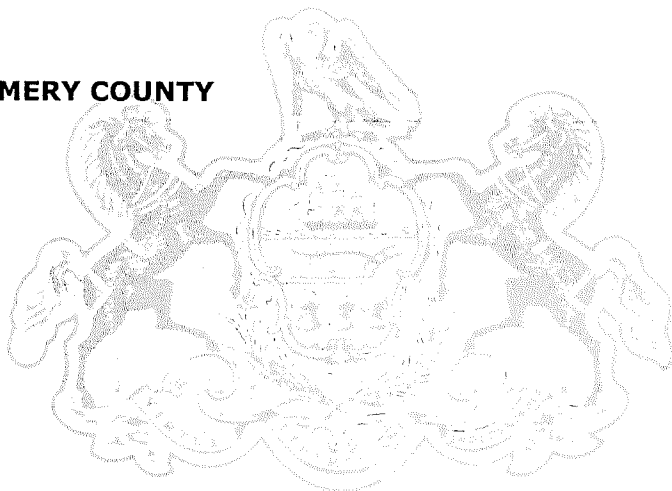
Date Issued: **AUGUST 12, 2014**

Date Filed: **JULY 10, 1965**

Name: **ROBIN ANN ALTIERI**

Sex: **FEMALE**

Place of Birth: **MONTGOMERY COUNTY**



This is to certify that this is a true copy of the record which is on file in the Pennsylvania Department of Health, in accordance with the Vital Statistics Law of 1953, as amended.

*Marina O'Reilly Matthew*

Marina O'Reilly Matthew  
State Registrar



*Exhibit C*  
*BIRTH certificate*

**IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY,  
PENNSYLVANIA OFFICE OF JUDICIAL SUPPORT**

**RULE OF CIVIL PROCEDURE NO. 236**

Robinanne Altieri,  
Plaintiff

v.

Alexander Morella,  
Defendant.

No. CV-2018-081141

NOTICE IS GIVEN UNDER PENNSYLVANIA RULE OF CIVIL PROCEDURE NO. 236 THAT AN  
ORDER IN THE ABOVE CASE HAS BEEN ENTERED ON 07-25-2018.

SIGNED	07-25-2018
FILED	07-25-2018
PER	Judge John J. Whelan

**TIME AND LEGAL LIABILITY DO NOT PERMIT THE OFFICE OF JUDICIAL  
SUPPORT TO GIVE DOCKET INFORMATION BY TELEPHONE.**

**NO EXCEPTIONS!**

Robinanne Altieri CV-2018-081141  
12 Holbrook Rd  
Havertown PA 19083

*Exhibit D*  
*PFA order*

Fill in this information to identify the case:

Debtor 1 Robinnanne Anne Altieri a/k/a Antiques Collectibles a/k/a Robinnanne Anne Morella

Debtor 2  
(Spouse, if filing) \_\_\_\_\_

United States Bankruptcy Court for the: Eastern District of PA  
(State)

Case number 18-13128

Exhibit B

Official Form 410S1

**Notice of Mortgage Payment Change**

12/15

If the debtor's plan provides for payment of postpetition contractual installments on your claim secured by a security interest in the debtor's principal residence, you must use this form to give notice of any changes in the installment payment amount. File this form as a supplement to your proof of claim at least 21 days before the new payment amount is due. See Bankruptcy Rule 3002.1.

Name of creditor: Santander Bank, N.A.

Court claim no. (if known): 9

Last 4 digits of any number you use to identify the debtor's account:

0 4 6 4

Date of payment change:

Must be at least 21 days after date of this notice

08 / 21 / 18

New total payment:

\$ 115.51

Principal, interest, and escrow, if any

**Part 1: Escrow Account Payment Adjustment**

1. Will there be a change in the debtor's escrow account payment?

☒ No

☐ Yes. Attach a copy of the escrow account statement prepared in a form consistent with applicable nonbankruptcy law. Describe the basis for the change. If a statement is not attached, explain why: \_\_\_\_\_

Current escrow payment: \$ \_\_\_\_\_

New escrow payment: \$ \_\_\_\_\_

**Part 2: Mortgage Payment Adjustment**

2. Will the debtor's principal and interest payment change based on an adjustment to the interest rate on the debtor's variable-rate account?

☒ No

☐ Yes. Attach a copy of the rate change notice prepared in a form consistent with applicable nonbankruptcy law. If a notice is not attached, explain why: \_\_\_\_\_

Current interest rate: \_\_\_\_\_%

New interest rate: \_\_\_\_\_%

Current principal and interest payment: \$ \_\_\_\_\_

New principal and interest payment: \$ \_\_\_\_\_

**Part 3: Other Payment Change**

3. Will there be a change in the debtor's mortgage payment for a reason not listed above?

☒ No

☐ Yes. Attach a copy of any documents describing the basis for the change, such as a repayment plan or loan modification agreement. (Court approval may be required before the payment change can take effect.)

Reason for change: Number of days in month change payment amount

Current mortgage payment: \$ 113.73

New mortgage payment: \$ 115.51

Debtor 1 Robinanne Anne Altieri a/k/a Antiques Collectibles a/k/a Robinanne Anne Morella  
First Name Middle Name Last Name

Case number (if known) 18-13128

**Part 4: Sign Here**

The person completing this Notice must sign it. Sign and print your name and your title, if any, and state your address and telephone number.

Check the appropriate box.

- ☒ I am the creditor.  
☐ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

x Melissa A Epler  
Signature

Date 08 / 02 / 2018

Print: Melissa A Epler  
First Name Middle Name Last Name

Title Bankruptcy Administrator

Company Santander Bank, N.A.

Address 450 Penn Street  
Number Street  
Reading PA 19602  
City State ZIP Code

Contact phone (610) 401-9312

Email DeftBkr@santander.us